

EXHIBIT B

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UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC.
PASSENGER SEXUAL ASSAULT
LITIGATION

This Document Relates to:

WHB 1486 v. Uber Technologies, Inc., et al.
Case No. 3:24-cv-04803

MDL No. 3084 CRB

**PLAINTIFF WHB 1486'S REPONSES TO
DEFENDANTS UBER TECHNOLOGIES,
INC., RASIER, LLC, AND RASIER-CA,
LLC'S INTERROGATORIES**

PROPOUNDING PARTIES:

**DEFENDANTS UBER TECHNOLOGIES, INC., RASIER,
LLC, AND RASIER-CA, LLC**

RESPONDING PARTY·

PLAINTIFF WHB 1486

1 While Plaintiff has put her mental, psychological, and psychiatric health at issue in the present
 2 suit, that does not entitle Propounding Parties to an unrestricted fishing expedition into all treatment
 3 Plaintiff has ever received in her lifetime, unrestricted by type or limited to a temporal period even
 4 remotely connected to the ALLEGED INCIDENT.

5 Thus, to the extent this Request seeks medical information regarding matters not directly relevant
 6 or germane to Plaintiff's claims, Plaintiff objects on the grounds of relevancy, overbreadth, and privacy.
 7 *Soto v. City of Concord*, 162 F.R.D. 603, 618 (N.D. Cal. 1995) (citing *Whalen v. Roe*, 429 U.S. 589-600
 8 (1977)). A litigant's waiver of privacy rights by putting private matters at issue in a lawsuit is limited to
 9 the private information that is relevant to the lawsuit. *See, e.g., Enwere v. Terman Assocs., L.P.*, No. C 07-
 10 1239 JF (PVT), 2008 U.S. Dist. LEXIS 101901, at *5-6 (N.D. Cal. Dec. 3, 2008) citing *Doe v. City of*
 11 *Chula Vista*, 196 F.R.D. 562, 569-70 (S.D. Cal. 1999) (a plaintiff's claim for emotional distress damages
 12 "does not entitle defendants to invade the whole of [the plaintiff's] medical history"). In light of these
 13 privacy interests, disclosure of highly confidential and sensitive medical information should only be
 14 compelled where the documents concern those specific conditions the litigant has put directly at issue.

15 Plaintiff objects to the extent that it seeks the disclosure of information that would be protected
 16 from disclosure by the patient-physician privilege, psychotherapist privilege, and or doctor-patient
 17 privilege.

18 Furthermore, Plaintiff objects that this Interrogatory seeks identical information to that which has
 19 been disclosed in Plaintiff's FACT SHEET, and thus is cumulative and duplicative.

20 Subject to and without waiving the foregoing objections, Plaintiff responds as follows:

21 Plaintiff directs Defendants to Plaintiff's responses to the PLAINTIFF FACT SHEET, which
 22 contains and discloses the requested information.

23 If Defendants believe further information is relevant and subject to production, Plaintiff is willing
 24 to confer on this issue. Plaintiff reserves the right to supplement this response at a later time should she
 25 obtain more responsive, nonprivileged, relevant information.

26 **INTERROGATORY NO. 7:**

27 Describe in detail how, if at all, the ALLEGED INCIDENT has affected YOUR daily life,
 28 INCLUDING, but not limited to, how it has affected ANY of the day-to-day routines, tasks, hobbies, OR

1 responsibilities YOU conducted OR had prior to the ALLEGED INCIDENT.

2 **RESPONSE TO INTERROGATORY NO. 7:**

3 Subject to and without waiving Plaintiff's general objections, Plaintiff responds as follows:

4 Plaintiff has become distrustful of taking Uber and takes public transit when she can. She has
5 bottled up her feelings as a result of the assault.

6 If Defendants believe further information is relevant and subject to discovery, Plaintiff is willing
7 to confer on this issue. Additionally, discovery is ongoing. Plaintiff reserves the right to supplement this
8 response at a later time should she obtain more responsive, nonprivileged, relevant information.

9 **INTERROGATORY NO. 8:**

10 Provide an itemized statement of ALL DAMAGES, exclusive of pain AND suffering, YOU claim
11 to have sustained as a result of the ALLEGED INCIDENT INCLUDING an itemized statement of ANY
12 out-of-pocket costs, INCLUDING MEDICAL EXPENSES covered by insurance, YOU claim to have
13 incurred RELATING TO the diagnosis OR treatment of ANY INJURIES YOU allege YOU sustained as
14 a result of the ALLEGED INCIDENT.

15 **RESPONSE TO INTERROGATORY NO. 8:**

16 To the extent that this Interrogatory seeks information regarding Plaintiff's future expected out of
17 pocket costs and damages, Plaintiff objects that the request impermissibly intrudes on Plaintiff's counsel's
18 attorney work product by seeking, prematurely, expert evidence and information. Plaintiff will disclose
19 expert discovery at the time specified by the Court.

20 Plaintiff also objects to Interrogatory No. 8 more broadly, to the extent that it requires a legal
21 conclusion and/or the disclosure of information that is protected from disclosure by the attorney-client
22 privilege and/or the attorney work-product doctrine.

23 To the extent that the Interrogatory is limited to Plaintiff's damages incurred to date, Plaintiff
24 responds, subject to and without waiving her specific and general objections, as follows:

25 None to date.

26 If Defendants believe further information is relevant and subject to discovery, Plaintiff is willing
27 to confer on this issue. Additionally, discovery is ongoing. Plaintiff reserves the right to supplement this
28 response at a later time should she obtain more responsive, nonprivileged, relevant information.

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10 *Attorneys for Plaintiff*

11 **UNITED STATES DISTRICT COURT**
12 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

13 IN RE: UBER TECHNOLOGIES, INC.
14 PASSENGER SEXUAL ASSAULT
15 LITIGATION

16 This Document Relates to:

17 [REDACTED] v. *Uber Technologies, Inc., et al.*,
18 3:23-cv-06708

19 **MDL No. 3084 CRB**

20 **PLAINTIFF [REDACTED] RESPONSE**
21 **TO DEFENDANTS UBER TECHNOLOGIES,**
22 **INC., RASIER, LLC, AND RASIER-CA,**
23 **LLC'S INTERROGATORIES**

24 PROPOUNDING PARTIES: **DEFENDANTS UBER TECHNOLOGIES, INC., RASIER,**
25 **LLC, AND RASIER-CA, LLC**

26 RESPONDING PARTY: **PLAINTIFF [REDACTED]**

1 mental and physical health;

- 2 - Symptoms of depression and anxiety, including inability to get out of bed or eat, laying in bed
3 replaying the events of the Alleged Incident, and uncontrollable panic attacks experienced for
4 months following the Alleged Incident;
- 5 - Inability and fear of sitting in the backseat of a vehicle unaccompanied since the Alleged Incident
6 and to this day;
- 7 - Change in Plaintiff's personality, which used to be described as joyful and happy, extroverted and
8 social. Since the Alleged Incident, Plaintiff only feels comfortable speaking with individuals with
9 whom she is familiar and comfortable; and
- 10 - Out of pocket costs and additional time management needed to ensure transportation outside of
11 the use of Uber's rideshare services since the date of the Alleged Incident and to this day.

12 If Defendants believe further data is relevant and subject to discovery, Plaintiff is willing to confer
13 on this issue. Plaintiff reserves the right to supplement this response at a later time should she obtain or
14 recall more responsive, nonprivileged, relevant information.

INTERROGATORY NO. 4:

16 For each INJURY identified in response to Interrogatory No. 3, identify every symptom, condition,
17 OR manifestation that YOU believe YOU have experienced as a result of that INJURY AND when YOU
18 first experienced each symptom, condition, OR manifestation, INCLUDING whether YOU ever
19 experienced that symptom, condition, OR manifestation before the ALLEGED INCIDENT.

RESPONSE TO INTERROGATORY NO. 4:

21 Plaintiff objects to Interrogatory No. 4 to the extent that it requires a legal conclusion and/or the
22 disclosure of information that is protected from disclosure by the attorney-client privilege and/or the
23 attorney work-product doctrine.

24 Plaintiff further objects to the extent that this Request seeks, prematurely, expert materials and/or
25 opinions, as doing so impermissibly intrudes upon her counsel's work product.

26 Plaintiff further objects that case specific discovery has just begun, and as such this request may
27 be premature.

28 Subject to and without waiving the foregoing objections, Plaintiff responds as follows:

1 The Alleged Incident has caused Plaintiff to experience the following symptoms:

2 The Alleged Incident has caused Plaintiff to experience the following:

- 3 - An overwhelming feeling of humiliation, being robbed of personal dignity and safety, and feeling
4 violated in the immediate aftermath of the Alleged Incident and to this day;
- 5 - Symptoms of anxiety, including sleep disturbances and paranoia since the Alleged Incident and to
6 this day.
- 7 - Overwhelming fear, since the date of the Alleged Incident and to this day;
- 8 - Interrupted sleep and overwhelming fear of the dark, flashbacks to the Alleged Incident and the
9 dark backseat of the vehicle of the Driver who perpetrated the assault during the Alleged Incident.
10 Plaintiff has to sleep with a night light to this day and had to share a room with a family member
11 for months following the Alleged Incident due to her fear of the dark, flashbacks, and the effects
12 of same;
- 13 - Abrasions and scratches on Plaintiff's back, bruises on Plaintiff's arm, irritation in Plaintiff's
14 cervix, immediately following the Alleged Incident;
- 15 - Undergoing a SANE exam, or sexual assault (rape) kit, including a general medical exam and
16 medical forensic exam, the collection of oral, buccal, anal, external genital, and vaginal swabs,
17 collection of vaginal aspirate, urine sample, and Plaintiff's undergarments, pregnancy test,
18 administration of Ceftriaxone injection to prevent Gonorrhea, a Doxycycline prescription to
19 prevent Chlamydia, a Metronidazole prescription to prevent Trichomoniasis, a Levonorgestrel
20 prescription to prevent pregnancy, and a Dolutegravir & Emtricitabine prescription to prevent HIV
21 immediately following the Alleged Incident;
- 22 - Feeling of Plaintiff's thoughts being consumed by the Driver who perpetrated the Alleged Incident
23 and the sexual assault, since the Alleged Incident and to this day;
- 24 - Feeling of embarrassment in front of Plaintiff's flight attendant training class who found out about
25 the Alleged Incident immediately after the Alleged Incident occurred the day following the
26 Alleged Incident;
- 27 - Inability to graduate from flight attendant training at Mesa Airlines on November 16, 2023, the
28 day following the Alleged Incident, because of the effects of the Alleged Incident on Plaintiff's

1 mental and physical health;

- 2 - Symptoms of depression and anxiety, including inability to get out of bed or eat, laying in bed
3 replaying the events of the Alleged Incident, and uncontrollable panic attacks experienced for
4 months following the Alleged Incident;
- 5 - Inability and fear of sitting in the backseat of a vehicle unaccompanied since the Alleged Incident
6 and to this day;
- 7 - Change in Plaintiff's personality, which used to be described as joyful and happy, extroverted and
8 social. Since the Alleged Incident, Plaintiff only feels comfortable speaking with individuals with
9 whom she is familiar and comfortable; and
- 10 - Out of pocket costs and additional time management needed to ensure transportation outside of
11 the use of Uber's rideshare services since the date of the Alleged Incident and to this day.

12 If Defendants believe further data is relevant and subject to production, Plaintiff is willing to confer
13 on this issue. Plaintiff reserves the right to supplement this response at a later time should she obtain or
14 recall more responsive, nonprivileged, relevant information.

INTERROGATORY NO. 5:

16 If ANY MEDICAL PRACTITIONER has advised YOU that YOU may require future OR
17 additional treatment for ANY INJURIES that YOU attribute to the ALLEGED INCIDENT, state, for each
18 INJURY:

- 19 a. The name, address, AND phone number of the MEDICAL PRACTITIONER who advised
20 YOU;
- 21 b. The illness, condition, OR INJURY for which future treatment was discussed; AND
- 22 c. The nature, duration, AND estimated cost of the discussed future treatment.

RESPONSE TO INTERROGATORY NO. 5:

24 Subject to and without waiving Plaintiff's general objections, Plaintiff responds as follows:

25 Plaintiff has received discharge instructions and notes regarding general follow-ups to the medical
26 forensic examination completed on November 15, 2023 and future care advice from the following medical
27 practitioners:

- 28 - Forensic Nurse Examiner Unit, Jessica Weaver, RN, Honor Health Medical Center, 7400

1 or any other mental health treatment related to the effects of the Alleged Incident. Plaintiff directs
 2 Defendants to Plaintiff's responses to the PLAINTIFF FACT SHEET, which contains and discloses the
 3 requested information.

4 If Defendants believe further information is relevant and subject to production, Plaintiff is willing
 5 to confer on this issue. Plaintiff reserves the right to supplement this response at a later time should she
 6 obtain more responsive, nonprivileged, relevant information.

7 **INTERROGATORY NO. 7:**

8 Describe in detail how, if at all, the ALLEGED INCIDENT has affected YOUR daily life,
 9 INCLUDING, but not limited to, how it has affected ANY of the day-to-day routines, tasks, hobbies, OR
 10 responsibilities YOU conducted OR had prior to the ALLEGED INCIDENT.

11 **RESPONSE TO INTERROGATORY NO. 7:**

12 Subject to and without waiving Plaintiff's general objections, Plaintiff responds as follows:

13 The Alleged Incident has affected Plaintiff in the following ways:

- 14 - Symptoms of anxiety, including sleep disturbances and paranoia;
- 15 - Overwhelming fear in general;
- 16 - Interrupted sleep and overwhelming fear of the dark, flashbacks to the Alleged Incident and the
 17 dark backseat of the vehicle of the Driver who perpetrated the assault during the Alleged Incident.
 Plaintiff has to sleep with a night light to this day and had to share a room with a family member
 19 for months following the Alleged Incident due to her fear of the dark, flashbacks, and the effects
 20 of same;
- 21 - Plaintiff had to suspend her graduation from flight attendant training with Mesa Airlines on
 22 November 16, 2023 and return to stay with her parents because of the effects of the Alleged
 23 Incident on Plaintiff's mental and physical health. She was not able to complete the program and
 24 had to switch careers and undergo other specialized education and training;
- 25 - Feeling of Plaintiff's thoughts being consumed by the Driver who perpetrated the Alleged Incident
 26 and the sexual assault, since the Alleged Incident and to this day;
- 27 - Symptoms of depression and anxiety, including inability to get out of bed or eat, laying in bed
 28 replaying the events of the Alleged Incident, and uncontrollable panic attacks experienced for

1 months following the Alleged Incident;

- 2 - Inability and fear of sitting in the backseat of a vehicle unaccompanied since the Alleged Incident
3 and to this day;
- 4 - Change in Plaintiff's personality, which used to be described as joyful and happy, extroverted and
5 social. Since the Alleged Incident, Plaintiff only feels comfortable speaking with individuals with
6 whom she is familiar and comfortable; and
- 7 - Out of pocket costs and additional time management needed to ensure transportation outside of
8 the use of Uber's rideshare services since the date of the Alleged Incident and to this day.
- 9 - Modified ability for Plaintiff to be alone in public spaces, interacting with strangers, engaging
10 socially with individuals and crowds, interacting with individuals in a friendly or romantic manner,
11 socializing, interacting with friends and family, entering rideshare vehicles or public transportation
12 alone, and pursuing employment and education opportunities.

13 If Defendants believe further information is relevant and subject to discovery, Plaintiff is willing
14 to confer on this issue. Additionally, discovery is ongoing. Plaintiff reserves the right to supplement this
15 response at a later time should she obtain more responsive, nonprivileged, relevant information.

16 **INTERROGATORY NO. 8:**

17 Provide an itemized statement of ALL DAMAGES, exclusive of pain AND suffering, YOU claim
18 to have sustained as a result of the ALLEGED INCIDENT INCLUDING an itemized statement of ANY
19 out-of-pocket costs, INCLUDING MEDICAL EXPENSES covered by insurance, YOU claim to have
20 incurred RELATING TO the diagnosis OR treatment of ANY INJURIES YOU allege YOU sustained as
21 a result of the ALLEGED INCIDENT.

22 **RESPONSE TO INTERROGATORY NO. 8:**

23 To the extent that this Interrogatory seeks information regarding Plaintiff's future expected out of
24 pocket costs and damages, Plaintiff objects that the request impermissibly intrudes on Plaintiff's counsel's
25 attorney work product by seeking, prematurely, expert evidence and information. Plaintiff will disclose
26 expert discovery at the time specified by the Court.

27 Plaintiff also objects to Interrogatory No. 8 more broadly, to the extent that it requires a legal
28 conclusion and/or the disclosure of information that is protected from disclosure by the attorney-client

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10 *Attorneys for Plaintiff*

11 **UNITED STATES DISTRICT COURT**

12 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

13
14 IN RE: UBER TECHNOLOGIES, INC.
14 PASSENGER SEXUAL ASSAULT
15 LITIGATION

16 This Document Relates to:

17 *A.R. v. Uber Technologies, Inc., et al., 3:24-cv-*
18 *07821*

19
20 **MDL No. 3084 CRB**

21 **PLAINTIFF A.R.'S REONSE TO**
21 **DEFENDANTS UBER TECHNOLOGIES,**
22 **INC., RASIER, LLC, AND RASIER-CA,**
22 **LLC'S INTERROGATORIES**

23 PROPOUNDING PARTIES: **DEFENDANTS UBER TECHNOLOGIES, INC., RASIER,**
24 **LLC, AND RASIER-CA, LLC**

25 RESPONDING PARTY: **PLAINTIFF A.R.**

1 Plaintiff has ever received in her lifetime, unrestricted by type or limited to a temporal period even
 2 remotely connected to the ALLEGED INCIDENT.

3 Thus, to the extent this Request seeks medical information regarding matters not directly relevant
 4 or germane to Plaintiff's claims, Plaintiff objects on the grounds of relevancy, overbreadth, and privacy.
 5 *Soto v. City of Concord*, 162 F.R.D. 603, 618 (N.D. Cal. 1995) (citing *Whalen v. Roe*, 429 U.S. 589-600
 6 (1977). A litigant's waiver of privacy rights by putting private matters at issue in a lawsuit is limited to
 7 the private information that is relevant to the lawsuit. See, e.g., *Enwere v. Terman Assocs., L.P.*, No. C 07-
 8 1239 JF (PVT), 2008 U.S. Dist. LEXIS 101901, at *5-6 (N.D. Cal. Dec. 3, 2008) citing *Doe v. City of*
 9 *Chula Vista*, 196 F.R.D. 562, 569-70 (S.D. Cal. 1999) (a plaintiff's claim for emotional distress damages
 10 "does not entitle defendants to invade the whole of [the plaintiff's] medical history"). In light of these
 11 privacy interests, disclosure of highly confidential and sensitive medical information should only be
 12 compelled where the documents concern those specific conditions the litigant has put directly at issue.

13 Plaintiff objects to the extent that it seeks the disclosure of information that would be protected
 14 from disclosure by the patient-physician privilege, psychotherapist privilege, and or doctor-patient
 15 privilege.

16 Furthermore, Plaintiff objects that this Interrogatory seeks identical information to that which has
 17 been disclosed in Plaintiff's FACT SHEET, and thus is cumulative and duplicative.

18 Subject to and without waiving the foregoing objections, Plaintiff responds as follows:

19 Plaintiff directs Defendants to Plaintiff's responses to the PLAINTIFF FACT SHEET, which
 20 contains and discloses the requested information.

21 If Defendants believe further information is relevant and subject to production, Plaintiff is willing
 22 to confer on this issue. Plaintiff reserves the right to supplement this response at a later time should she
 23 obtain more responsive, nonprivileged, relevant information.

24 **INTERROGATORY NO. 7:**

25 Describe in detail how, if at all, the ALLEGED INCIDENT has affected YOUR daily life,
 26 INCLUDING, but not limited to, how it has affected ANY of the day-to-day routines, tasks, hobbies, OR
 27 responsibilities YOU conducted OR had prior to the ALLEGED INCIDENT.

28 **RESPONSE TO INTERROGATORY NO. 7:**

1 Subject to and without waiving Plaintiff's general objections, Plaintiff responds as follows:

2 The Alleged Incident has affected Plaintiff in the following ways:

- 3 - An overwhelming feeling of embarrassment, confusion, anger, and fear in the immediate aftermath
4 of the Alleged Incident;
- 5 - Symptoms of anxiety in public spaces, experienced since the date of the Alleged Incident to this
6 day;
- 7 - Symptoms of anxiety in general, which have been exacerbated since the date of the Alleged
8 Incident and to this day;
- 9 - Symptoms of depression, which have been exacerbated since the date of the Alleged Incident and
10 to this day;
- 11 - Fear and hypervigilance when taking Uber or other rideshare services in general, experienced since
12 the date of the Alleged Incident and to this day;
- 13 - Fear and hypervigilance when taking Uber or other rideshare services unaccompanied,
14 experienced since the date of the Alleged Incident and to this day;
- 15 - Fear, symptoms of anxiety, and hypervigilance when taking Uber or other rideshare services and
16 the Driver is not a woman, experienced since the date of the Alleged Incident and to this day;
- 17 - Fear, symptoms of anxiety, and panic when taking Uber or other rideshare services and the Driver
18 is driving fast, experienced since the date of the Alleged Incident and to this day;
- 19 - Feeling of dissociation related to the Alleged Incident, experienced for months following the
20 Alleged Incident;
- 21 - Sleep disturbances and insomnia, experienced for months following the Alleged Incident;
- 22 - Difficulty focusing on work and daily tasks, experienced for months following the Alleged
23 Incident;
- 24 - Symptoms of social anxiety and stress that have affected Plaintiff's ability to make new social
25 connections and participate in daily activities, experienced since the date of the Alleged Incident
26 and to this day;
- 27 - Fear, nervousness, and symptoms of anxiety when Plaintiff is around strangers, walking in a
28 neighborhood that isn't heavily populated, walking down empty streets, experienced since the date

1 of the Alleged Incident and to this day;

2 - Decreased motivation for activities, isolation, and appetite since the date of the Alleged Incident
 3 and to this day;

4 - Spending more time in bed, inability to follow daily routine, and feeling of numbness, for weeks
 5 following the date of the Alleged Incident;

6 - Other symptoms related to generalized anxiety disorder and major depressive disorder,
 7 exacerbated since the date of the Alleged Incident and to this day; and

8 - General disruption of Plaintiff's daily routine, including sleep, interacting with friends, family,
 9 romantic relationships, and strangers, socializing, and being alone in public spaces, experienced
 10 since the date of the Alleged Incident and to this day.

11 If Defendants believe further information is relevant and subject to discovery, Plaintiff is willing
 12 to confer on this issue. Additionally, discovery is ongoing. Plaintiff reserves the right to supplement this
 13 response at a later time should she obtain more responsive, nonprivileged, relevant information.

14 **INTERROGATORY NO. 8:**

15 Provide an itemized statement of ALL DAMAGES, exclusive of pain AND suffering, YOU claim
 16 to have sustained as a result of the ALLEGED INCIDENT INCLUDING an itemized statement of ANY
 17 out-of-pocket costs, INCLUDING MEDICAL EXPENSES covered by insurance, YOU claim to have
 18 incurred RELATING TO the diagnosis OR treatment of ANY INJURIES YOU allege YOU sustained as
 19 a result of the ALLEGED INCIDENT.

20 **RESPONSE TO INTERROGATORY NO. 8:**

21 To the extent that this Interrogatory seeks information regarding Plaintiff's future expected out of
 22 pocket costs and damages, Plaintiff objects that the request impermissibly intrudes on Plaintiff's counsel's
 23 attorney work product by seeking, prematurely, expert evidence and information. Plaintiff will disclose
 24 expert discovery at the time specified by the Court.

25 Plaintiff also objects to Interrogatory No. 8 more broadly, to the extent that it requires a legal
 26 conclusion and/or the disclosure of information that is protected from disclosure by the attorney-client
 27 privilege and/or the attorney work-product doctrine.

28 In lieu of responding regarding any written documents in her custody, possession, or control,

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.
PASSENGER SEXUAL ASSAULT
LITIGATION

This Document Relates to:

Jane Doe QLF 001 v. Uber Technologies, Inc., et al.; C.A. No. 3:24-cv-08783-CRB

MDL No. 3084 CRB

**PLAINTIFF JANE DOE QLF 001'S
RESPONSE TO DEFENDANTS UBER
TECHNOLOGIES, INC.'S, RASIER, LLC'S,
AND RASIER-CA, LLC'S
INTERROGATORIES, SET ONE**

**PROPOUNDING PARTIES: DEFENDANTS UBER TECHNOLOGIES, INC., RASIER,
LLC, AND RASIER-CA, LLC**

RESPONDING PARTY: PLAINTIFF JANE DOE QLF 001

Plaintiff Jane Doe QLF 001 (hereinafter, "Plaintiff") hereby objects and responds

Plaintiff Jane Doe QLF 001 (hereinafter, "Plaintiff") hereby objects and responds to Defendants Uber Technologies, Inc.'s, Rasier, LLC's, and Rasier-CA, LLC's Interrogatories, Set One, as follows:

PRELIMINARY STATEMENT

Plaintiff has not completed discovery; the investigation of the facts, witnesses, or documents; the analysis of available information; or the preparation for trial in this case. These responses, while based on diligent inquiry and investigation by Plaintiff, reflect only the current state of Plaintiff's knowledge, understanding, and belief, based upon the information reasonably available to the Plaintiff at this time. As this action proceeds and further investigation and discovery are conducted, additional or different facts and information could be revealed to Plaintiff. Moreover, Plaintiff anticipates that the Propounding Parties may make legal or factual contentions presently unknown to and unforeseen by Plaintiff which may

1 *Soto v. City of Concord*, 162 F.R.D. 603, 618 (N.D. Cal. 1995) (citing *Whalen v. Roe*, 429 U.S. 589-600
 2 (1977). A litigant's waiver of privacy rights by putting private matters at issue in a lawsuit is limited to
 3 the private information that is relevant to the lawsuit. See, e.g., *Enwere v. Terman Assocs., L.P.*, No. C 07-
 4 1239 JF (PVT), 2008 U.S. Dist. LEXIS 101901, at *5-6 (N.D. Cal. Dec. 3, 2008) citing *Doe v. City of*
 5 *Chula Vista*, 196 F.R.D. 562, 569-70 (S.D. Cal. 1999) (a plaintiff's claim for emotional distress damages
 6 "does not entitle defendants to invade the whole of [the plaintiff's] medical history"). In light of these
 7 privacy interests, disclosure of highly confidential and sensitive medical information should only be
 8 compelled where the documents concern those specific conditions the litigant has put directly at issue.

9 Plaintiff objects to the extent that this interrogatory seeks the disclosure of information that would
 10 be protected from disclosure by the patient-physician privilege, psychotherapist privilege, and or doctor-
 11 patient privilege.

12 Furthermore, Plaintiff objects that this Interrogatory seeks identical information to that which has
 13 been disclosed in Plaintiff's FACT SHEET, and, thus, is cumulative and duplicative.

14 Subject to and without waiving the foregoing objections, Plaintiff responds as follows:

15 Plaintiff directs Defendants to Plaintiff's responses to the PLAINTIFF FACT SHEET, which
 16 contains and discloses the requested information.

17 If Defendants believe further information is relevant and subject to production, Plaintiff is willing
 18 to confer on this issue. Plaintiff reserves the right to supplement this response at a later time should she
 19 obtain more responsive, nonprivileged, relevant information.

20 **INTERROGATORY NO. 7:**

21 Describe in detail how, if at all, the ALLEGED INCIDENT has affected YOUR daily life,
 22 INCLUDING, but not limited to, how it has affected ANY of the day-to-day routines, tasks, hobbies, OR
 23 responsibilities YOU conducted OR had prior to the ALLEGED INCIDENT.

24 **RESPONSE TO INTERROGATORY NO. 7:**

25 Subject to and without waiving Plaintiff's general objections, Plaintiff responds as follows:

26 Since the incident, in general, my daily life has been inflicted with emotional distress which has
 27 resulted in a problematic periodic use of alcohol and drugs. Throughout my daily life I have bouts of
 28 depressed mood, sadness, discouragement, diminished confidence, restlessness, indecisiveness, low self-

1 esteem, irritability, increased appetite, poor concentration, fatigue, fearfulness, feeling overwhelmed,
 2 worry, and anxiety. These symptoms have resulted in me having inconsistent sleep and thoughts of suicide
 3 and self-harm. The symptoms have and continue to affect my personal relationships, interruption of my
 4 daily routines at home and at work, and socializing with friends and family.

5 If Defendants believe further information is relevant and subject to discovery, Plaintiff is willing
 6 to confer on this issue. Additionally, discovery is ongoing. Plaintiff reserves the right to supplement this
 7 response at a later time should she obtain more responsive, nonprivileged, relevant information.

8 **INTERROGATORY NO. 8:**

9 Provide an itemized statement of ALL DAMAGES, exclusive of pain AND suffering, YOU claim
 10 to have sustained as a result of the ALLEGED INCIDENT INCLUDING an itemized statement of ANY
 11 out-of-pocket costs, INCLUDING MEDICAL EXPENSES covered by insurance, YOU claim to have
 12 incurred RELATING TO the diagnosis OR treatment of ANY INJURIES YOU allege YOU sustained as
 13 a result of the ALLEGED INCIDENT.

14 **RESPONSE TO INTERROGATORY NO. 8:**

15 To the extent that this Interrogatory seeks information regarding Plaintiff's future expected out-
 16 of-pocket costs and damages, Plaintiff objects that the request impermissibly intrudes on Plaintiff's
 17 counsel's attorney work product by seeking, prematurely, expert evidence and information. Plaintiff will
 18 disclose expert discovery at the time specified by the Court.

19 Plaintiff also objects to Interrogatory No. 8 more broadly, to the extent that it requires a legal
 20 conclusion and/or the disclosure of information that is protected from disclosure by the attorney-client
 21 privilege and/or the attorney work-product doctrine.

22 To the extent that the Interrogatory is limited to Plaintiff's damages incurred to date, Plaintiff
 23 responds, subject to and without waiving her specific and general objections, as follows:

24 In lieu of responding regarding any written documents in her custody, possession, or control,
 25 Plaintiff directs Propounding Parties to the documents produced in response to Propounding Parties'
 26 concurrently-served Requests for Production Nos. 4, 10, and 11.

27 If Defendants believe further information is relevant and subject to discovery, Plaintiff is willing
 28 to confer on this issue. Additionally, discovery is ongoing. Plaintiff reserves the right to supplement this

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Attorney for Plaintiff

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.
PASSENGER SEXUAL ASSAULT
LITIGATION

This Document Relates to:

T.L v. Uber Technologies, Inc., et al.
No. 23-cv-9217

Case 3:23-md-03084-CRB

MDL No. 3084

Honorable Charles R. Breyer

JURY TRIAL DEMANDED

**PLAINTIFF T.L.'S REONSE TO
DEFENDANTS UBER TECHNOLOGIES,
INC., RASIER, LLC, AND RASIER-CA,
LLC'S INTERROGATORIES**

PROPOUNDING PARTIES: DEFENDANTS UBER TECHNOLOGIES, INC., RASIER, LLC,
AND RASIER-CA, LLC

RESPONDING PARTY: PLAINTIFF T.L.

SET NO. : ONE (1)

1 While Plaintiff has put her mental, psychological, and psychiatric health at issue in the present
2 suit, that does not entitle Propounding Parties to an unrestricted fishing expedition into all treatment
3 Plaintiff has ever received in her lifetime, unrestricted by type or limited to a temporal period even
4 remotely connected to the ALLEGED INCIDENT.

5 Thus, to the extent this Request seeks medical information regarding matters not directly relevant
6 or germane to Plaintiff's claims, Plaintiff objects on the grounds of relevancy, overbreadth, and privacy.
7 Soto v. City of Concord, 162 F.R.D. 603, 618 (N.D. Cal. 1995) (citing *Whalen v. Roe*, 429 U.S. 589-600
8 (1977)). A litigant's waiver of privacy rights by putting private matters at issue in a lawsuit is limited to
9 the private information that is relevant to the lawsuit. See, e.g., *Enwere v. Terman Assocs., L.P.*, No. C 07-
10 1239 JF (PVT), 2008 U.S. Dist. LEXIS 101901, at *5-6 (N.D. Cal. Dec. 3, 2008) citing *Doe v. City of*
11 *Chula Vista*, 196 F.R.D. 562, 569-70 (S.D. Cal. 1999) (a plaintiff's claim for emotional distress damages
12 "does not entitle defendants to invade the whole of [the plaintiff's] medical history"). In light of these
13 privacy interests, disclosure of highly confidential and sensitive medical information should only be
14 compelled where the documents concern those specific conditions the litigant has put directly at issue.

15 Plaintiff objects to the extent that it seeks the disclosure of information that would be protected
16 from disclosure by the patient-physician privilege, psychotherapist privilege, and or doctor-patient
17 privilege.

18 Furthermore, Plaintiff objects that this Interrogatory seeks identical information to that which has
19 been disclosed in Plaintiff's FACT SHEET, and thus is cumulative and duplicative.

20 Subject to and without waiving the foregoing objections, Plaintiff responds as follows:

21 Plaintiff directs Defendants to Plaintiff's responses to the PLAINTIFF FACT SHEET, which
22 contains and discloses the requested information.

23 If Defendants believe further information is relevant and subject to production, Plaintiff is willing
24 to confer on this issue. Plaintiff reserves the right to supplement this response at a later time should she
25 obtain more responsive, nonprivileged, relevant information.

26 **INTERROGATORY NO. 7:**

27 Describe in detail how, if at all, the ALLEGED INCIDENT has affected YOUR daily life,
28 INCLUDING, but not limited to, how it has affected ANY of the day-to-day routines, tasks, hobbies, OR

1 responsibilities YOU conducted OR had prior to the ALLEGED INCIDENT.

2 **RESPONSE TO INTERROGATORY NO. 7:**

3 Subject to and without waiving Plaintiff's general objections, Plaintiff responds as follows:

4 The incident has had a profound impact on Plaintiff's life in ways that are difficult to fully
5 document here. Plaintiff attempts to Respond to this Interrogatory by stating and responding as follows:
6 The impact to Plaintiff includes but is not limited to the following: Plaintiff was out of work for a few
7 days due to the incident. After the incident, she found it hard to look at herself in the mirror. She had
8 trouble forcing herself to bathe because she was so disgusted. Plaintiff was paranoid and found it hard to
9 eat and sleep. She felt as if she had lost control over herself and started to hate herself and isolate. She
10 was in disbelief that the assault had occurred. To this day, it is extremely triggering for the Plaintiff every
11 time she is with a group of friends and they decide to take an Uber. Even getting in a car with another
12 person is triggering for her. She has had a high increase in panic attacks since the incident that still continue
13 to occur.

14 If Defendants believe further information is relevant and subject to discovery, Plaintiff is willing
15 to confer on this issue. Additionally, discovery is ongoing. Plaintiff reserves the right to supplement this
16 response at a later time should she obtain more responsive, nonprivileged, relevant information.

17 **INTERROGATORY NO. 8:**

18 Provide an itemized statement of ALL DAMAGES, exclusive of pain AND suffering, YOU claim
19 to have sustained as a result of the ALLEGED INCIDENT INCLUDING an itemized statement of ANY
20 out-of-pocket costs, INCLUDING MEDICAL EXPENSES covered by insurance, YOU claim to have
21 incurred RELATING TO the diagnosis OR treatment of ANY INJURIES YOU allege YOU sustained as
22 a result of the ALLEGED INCIDENT.

23 **RESPONSE TO INTERROGATORY NO. 8:**

24 To the extent that this Interrogatory seeks information regarding Plaintiff's future expected out of
25 pocket costs and damages, Plaintiff objects that the request impermissibly intrudes on Plaintiff's counsel's
26 attorney work product by seeking, prematurely, expert evidence and information. Plaintiff will disclose
27 expert discovery at the time specified by the Court.

28 Plaintiff also objects to Interrogatory No. 8 more broadly, to the extent that it requires a legal

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Attorneys for Plaintiff JANE ROE CL 68

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

IN RE: UBER TECHNOLOGIES, INC.
PASSENGER SEXUAL ASSAULT
LITIGATION

This Document Relates to:

Jane Roe CL 68 v. Uber Technologies, Inc., et al.
Case No. 3:24-cv-06669

MDL No. 3084 CRB

**PLAINTIFF JANE ROE CL 68'S RESPONSES
TO DEFENDANTS UBER TECHNOLOGIES,
INC., RASIER, LLC, AND RASIER-CA,
LLC'S INTERROGATORIES, SET ONE**

PROPOUNDING PARTIES: **DEFENDANTS UBER TECHNOLOGIES, INC., RASIER,
LLC, AND RASIER-CA, LLC**

RESPONDING PARTY: PLAINTIFF JANE ROE CL 68

SET NO.: ONE

1 on this issue. Plaintiff reserves the right to supplement this response at a later time should she obtain or
 2 recall more responsive, nonprivileged, relevant information.

3 **INTERROGATORY NO. 4:**

4 For each INJURY identified in response to Interrogatory No. 3, identify every symptom, condition,
 5 OR manifestation that YOU believe YOU have experienced as a result of that INJURY AND when YOU
 6 first experienced each symptom, condition, OR manifestation, INCLUDING whether YOU ever
 7 experienced that symptom, condition, OR manifestation before the ALLEGED INCIDENT.

8 **RESPONSE TO INTERROGATORY NO. 4:**

9 Plaintiff objects to Interrogatory No. 4 to the extent that it requires a legal conclusion and/or the
 10 disclosure of information that is protected from disclosure by the attorney-client privilege and/or the
 11 attorney work-product doctrine.

12 Plaintiff further objects to the extent that this Request seeks, prematurely, expert materials and/or
 13 opinions, as doing so impermissibly intrudes upon her counsel's work product.

14 Plaintiff further objects that case specific discovery has just begun, and as such this request may
 15 be premature.

16 Subject to and without waiving the foregoing objections, Plaintiff responds as follows:

17 Plaintiff suffered significant mental health injuries as a result of the assault. Plaintiff no longer
 18 feels safe utilizing rideshare services, which was her primary form of transportation, and feels
 19 significantly more scared and anxious in her daily environment. To this day, Plaintiff continues to feel
 20 unsafe in cars with strangers; has deep trust issues around men that negatively impact her relationships
 21 with the opposite sex, including her personal and romantic ones; is negatively and significantly triggered
 22 by particular smells reminiscent of the Uber driver who assaulted her; and has experienced a noticeable
 23 and sustained loss of personal dignity. These are all conditions that arose immediately after the assault
 24 and continue still. Plaintiff was so traumatized that she missed work for two days after the assault and
 25 ultimately shifted employment so that she would not have to continue utilizing rideshare services for
 26 daily transport.

27 If Defendants believe further data is relevant and subject to production, Plaintiff is willing to confer
 28 on this issue. Plaintiff reserves the right to supplement this response at a later time should she obtain or

1 recall more responsive, nonprivileged, relevant information.

2 **INTERROGATORY NO. 5:**

3 If ANY MEDICAL PRACTITIONER has advised YOU that YOU may require future OR
 4 additional treatment for ANY INJURIES that YOU attribute to the ALLEGED INCIDENT, state, for each
 5 INJURY:

- 6 a. The name, address, AND phone number of the MEDICAL PRACTITIONER who advised
 7 YOU;
- 8 b. The illness, condition, OR INJURY for which future treatment was discussed; AND
- 9 c. The nature, duration, AND estimated cost of the discussed future treatment.

10 **RESPONSE TO INTERROGATORY NO. 5:**

11 Subject to and without waiving Plaintiff's general objections, Plaintiff responds as follows:

12 University Medical Center Brackenridge, 601 E. 15th Street, Austin, TX 78701, (512) 324-7000.
 13 The doctor recommended psychiatric care for Plaintiff for symptoms of PTSD from which she was
 14 suffering stemming from the assault.

15 If Defendants believe further information is relevant and subject to discovery, Plaintiff is willing
 16 to confer on this issue. Additionally, discovery is ongoing. Plaintiff reserves the right to supplement this
 17 response at a later time should she obtain more responsive, nonprivileged, relevant information.

18 **INTERROGATORY NO. 6:**

19 IDENTIFY ANY MEDICAL PRACTITIONER who has diagnosed, examined, AND/OR
 20 provided YOU with ANY psychological, psychiatric, OR other mental health treatment, at ANY time
 21 prior to AND/OR following the ALLEGED INCIDENT INCLUDING (a) ANY such MEDICAL
 22 PRACTITIONER'S full name, address, AND telephone number; (b) the date(s) when YOU were
 23 diagnosed, examined, AND/OR treated; AND (c) the INJURY, condition, illness, etc. for which YOU
 24 were diagnosed, examined, AND/OR treated.

25 **RESPONSE TO INTERROGATORY NO. 6:**

26 Plaintiff objects to this Request on the grounds that the interrogatory is overbroad as to time and
 27 scope; disproportionate to the needs of the case; unduly burdensome to the point of being harassing and
 28 oppressive; and seeks information that is neither relevant nor likely to lead to the discovery of relevant

1 information.

2 While Plaintiff has put her mental, psychological, and psychiatric health at issue in the present
 3 suit, that does not entitle Propounding Parties to an unrestricted fishing expedition into all treatment
 4 Plaintiff has ever received in her lifetime, unrestricted by type or limited to a temporal period even
 5 remotely connected to the ALLEGED INCIDENT.

6 Thus, to the extent this Request seeks medical information regarding matters not directly relevant
 7 or germane to Plaintiff's claims, Plaintiff objects on the grounds of relevancy, overbreadth, and privacy.
 8 *Soto v. City of Concord*, 162 F.R.D. 603, 618 (N.D. Cal. 1995) (citing *Whalen v. Roe*, 429 U.S. 589-600
 9 (1977). A litigant's waiver of privacy rights by putting private matters at issue in a lawsuit is limited to
 10 the private information that is relevant to the lawsuit. See, e.g., *Enwere v. Terman Assocs., L.P.*, No. C 07-
 11 1239 JF (PVT), 2008 U.S. Dist. LEXIS 101901, at *5-6 (N.D. Cal. Dec. 3, 2008) citing *Doe v. City of*
 12 *Chula Vista*, 196 F.R.D. 562, 569-70 (S.D. Cal. 1999) (a plaintiff's claim for emotional distress damages
 13 "does not entitle defendants to invade the whole of [the plaintiff's] medical history"). In light of these
 14 privacy interests, disclosure of highly confidential and sensitive medical information should only be
 15 compelled where the documents concern those specific conditions the litigant has put directly at issue.

16 Plaintiff objects to the extent that it seeks the disclosure of information that would be protected
 17 from disclosure by the patient-physician privilege, psychotherapist privilege, and or doctor-patient
 18 privilege.

19 Furthermore, Plaintiff objects that this Interrogatory seeks identical information to that which has
 20 been disclosed in Plaintiff's FACT SHEET, and thus is cumulative and duplicative.

21 Subject to and without waiving the foregoing objections, Plaintiff responds as follows:

22 Plaintiff directs Defendants to Plaintiff's responses to the PLAINTIFF FACT SHEET, which
 23 contains and discloses the requested information.

24 If Defendants believe further information is relevant and subject to production, Plaintiff is willing
 25 to confer on this issue. Plaintiff reserves the right to supplement this response at a later time should she
 26 obtain more responsive, nonprivileged, relevant information.

27 **INTERROGATORY NO. 7:**

28 Describe in detail how, if at all, the ALLEGED INCIDENT has affected YOUR daily life,

1 INCLUDING, but not limited to, how it has affected ANY of the day-to-day routines, tasks, hobbies, OR
 2 responsibilities YOU conducted OR had prior to the ALLEGED INCIDENT.

3 **RESPONSE TO INTERROGATORY NO. 7:**

4 Subject to and without waiving Plaintiff's general objections, Plaintiff responds as follows:

5 Plaintiff no longer feels safe utilizing rideshare services (previously her primary form of
 6 transportation); feels significantly more scared and anxious in her daily environment as she goes about
 7 her usual routines; feels unsafe in cars with strangers; has deep trust issues around men that negatively
 8 impact her relationships with the opposite sex, not just with strangers out in public but in her personal
 9 life as well, negatively impacting how she interacts with her brothers, male friends, and romantic
 10 partners; is negatively and significantly triggered by particular smells reminiscent of the Uber driver
 11 who assaulted her, causing her to avoid being near to people for fear of encountering those smells; and
 12 in her daily life feels a noticeable and sustained loss of personal dignity. Plaintiff no longer feels as safe
 13 out in the world as she did before, which fundamentally impacts her daily life.

14 If Defendants believe further information is relevant and subject to discovery, Plaintiff is willing
 15 to confer on this issue. Additionally, discovery is ongoing. Plaintiff reserves the right to supplement this
 16 response at a later time should she obtain more responsive, nonprivileged, relevant information.

17 **INTERROGATORY NO. 8:**

18 Provide an itemized statement of ALL DAMAGES, exclusive of pain AND suffering, YOU claim
 19 to have sustained as a result of the ALLEGED INCIDENT INCLUDING an itemized statement of ANY
 20 out-of-pocket costs, INCLUDING MEDICAL EXPENSES covered by insurance, YOU claim to have
 21 incurred RELATING TO the diagnosis OR treatment of ANY INJURIES YOU allege YOU sustained as
 22 a result of the ALLEGED INCIDENT.

23 **RESPONSE TO INTERROGATORY NO. 8:**

24 To the extent that this Interrogatory seeks information regarding Plaintiff's future expected out of
 25 pocket costs and damages, Plaintiff objects that the request impermissibly intrudes on Plaintiff's counsel's
 26 attorney work product by seeking, prematurely, expert evidence and information. Plaintiff will disclose
 27 expert discovery at the time specified by the Court.

28 Plaintiff also objects to Interrogatory No. 8 more broadly, to the extent that it requires a legal